

UNITED STATES DISTRICT COURT
for the
Southern District of Indiana

United States of America)
v.)
) Case No.
) 1:21-mj-00709
Shaboo Rodgers,)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 4, 2020 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Possession of a Firearm by a Prohibited Person

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

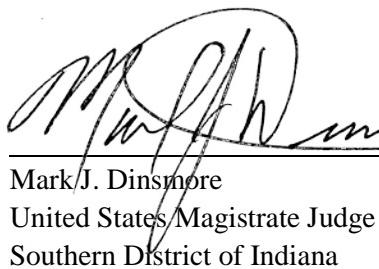
/s/ Gregory A. Kessie
Complainant's signature

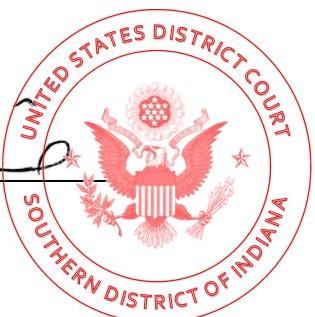
Gregory A. Kessie, TFO/ATF
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone (reliable electronic means)

Date: July 30, 2021

City and state: Indianapolis, Indiana


Mark J. Dinsmore
United States Magistrate Judge
Southern District of Indiana



AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

Your Affiant, Gregory A. Kessie, being duly sworn, does depose and state:

Affiant Background and Purpose of Affidavit

1. Your Affiant is a Task Force Officer (TFO) with the Federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), a component of the United States Department of Justice, and has served in that capacity since October 2020. Your Affiant is currently assigned to the Indianapolis Group I Field Office – Achilles Task Force- Crime Gun Intelligence Center (CGIC) and is charged with investigating violations of federal firearms, explosives, and arson laws, as well as offenses enumerated in Titles 18 and 26 of the United States Code. Your Affiant is a Detective for the Indianapolis Metropolitan Police Department (IMPD) and has been employed with IMPD since April 2007.

2. As a law enforcement officer, your Affiant has participated in investigations involving homicides, aggravated batteries, serious violent felons, firearms, drug trafficking, robberies, and financial crimes, among other matters. Your Affiant has also testified in judicial proceedings and prosecutions for violations of comparable state law. Your Affiant received their initial training at the Indianapolis Metropolitan Police Department Academy in 2007. Your Affiant has satisfied the minimum basic training requirements established by rules adopted by the law enforcement training board under I.C. 5-2-1-9 and described in I.C. 35-37-4-5. Your Affiant has received Basic Interview and Interrogation Course Training (2010), Characteristics of an Armed Offender training (2015), IMPD/ATF Task Force, Firearms Liaison Training, DNA/Print recovery course (2015), IMPD Narcotics Detective School, August 2011 (2016), Quarterly Firearms Training (held in Indianapolis) and Yearly in-service training (held in Indianapolis).

3. The information set forth in this Affidavit is based upon my participation in this investigation, review of law enforcement reports, discussions with other law enforcement officers involved in the investigation, and my experience and training. This Affidavit does not set forth every fact your Affiant has learned during this investigation, but rather is provided solely for establishing probable cause in support of the application for a Complaint in this matter. The information contained in the following paragraphs is either personally known to your Affiant or was told to your Affiant by other law enforcement officers.

4. This Affidavit is submitted in support of a Criminal Complaint charging Shaboo RODGERS (date of birth XX/XX/1975) and Social Security Number XXX-XX-1239) with Possession of a Firearm by a Prohibited Person in violation of Title 18, United States Code, Section 922(g)(1). The information contained in the following paragraphs is either personally known to your Affiant or was told to your Affiant by other law enforcement officers.

Facts Supporting Probable Cause

5. On May 4, 2020 Detectives with IMPD Crime Gun Intelligence Center (CGIC) were conducting surveillance at 324 W 29th Street in reference to a recent shooting.

6. That day, Detective Sergeant Shaughnessy was doing surveillance at the residence when he observed Shaboo RODGERS enter 324 W 29th St, Indianapolis, Indiana. There was a Jeep Cherokee parked in the front yard of the residence, with Indiana temporary plate L004608. Detective Sergeant Shaughnessy observed RODGERS move in and out of the front driver seat of the Jeep Cherokee several times. RODGERS had been identified as the perpetrator of an aggravated assault and residential burglary. Law enforcement was actively looking for him. Detective Sergeant Shaughnessy observed RODGERS get into the Jeep Cherokee and drive east on 29th St. Detective Wogan conducted a traffic stop on the Jeep Cherokee at 29th St. and N

Illinois St. RODGERS was taken into custody for his suspected involvement in the aggravated assault and residential burglary.

7. Based on RODGERS' suspected involvement in the aggravated assault and an ongoing investigation into 234 W. 29th Street, Detective Cooper applied for and was granted a search warrant for 324 W 29th Street. IMPD SWAT was requested to assist in serving this warrant.

8. Once the IMPD SWAT team cleared the residence and released the house to detectives, Detective Christopher Cooper observed a red Dodge Durango with Indiana license plate number WTZ148 and a black Volvo car with Indiana license plate number BTA545 parked in the back yard on the north side of the residence. The red Dodge Durango was parked next to the residence and the black Volvo was parked approximately (20) twenty feet north of the red Dodge Durango in the backyard. Detective Christopher Cooper requested Officer Roa and his K9 partner to conduct a narcotic sniff of both vehicles located on the property of 324 W 29th St. The K9 gave a positive identification to the presence of narcotics in both vehicles.

9. Detective Christopher Cooper applied for and was granted a search warrant for the black Volvo and red Dodge Durango parked in the backyard of 234 W 29th St.

10. During a search of the residence detectives located a Hi-Point, model CF380, 380 caliber handgun, bearing serial number P8036299 in the northwest bedroom on the top shelf of the closet, a Taurus, model 709 slim, 9mm handgun, bearing serial number TS040244 in the hall closet on the top shelf, a SKS, 7.62x39 rifle, bearing serial number 11228 in the southwest bedroom under the couch, and a 38-special revolver, model RG40, bearing serial number R116199 in the black Volvo under the driver seat. Each of the weapons was processed for prints and DNA.

11. On May 27, 2021, TFO Kessie received a laboratory report from the Indianapolis-Marion County Forensic Services Agency. The report compared the DNA Buccal Swab recovered from Shaboo RODGERS to the DNA sample taken from the grip of the Taurus handgun listed above. The Marion County Forensic Services Agency found that the DNA profile of the major contributor matches the DNA profile of Shaboo RODGERS.

12. Investigators submitted a latent print card with latent prints recovered from the Taurus handgun listed above to the IMPD Latent Print Unit. On May 05, 2020, Task Force Investigators received a Latent Print Comparison Report stating the prints recovered from the “side of the magazine” of the Taurus” were identified as belonging to Shaboo RODGERS.

13. The Taurus, Hi-Point, and SKS rifle described above were not manufactured in the state of Indiana. By virtue of their presence in the State of Indiana, therefore, the firearms had to have been transported or shipped in interstate or foreign commerce prior to May 04, 2020.

14. RODGERS has sustained the following convictions for crimes punishable by more than one (1) year of imprisonment:

- a. Possession of a controlled substance (as a D felony) under Marion County (Indiana) cause number 49G14-1205-FD-033762 on or about October 13, 2012;
- b. Dealing in a narcotic drug (as a B felony) under Marion County (Indiana) cause number 49G20-0102-CF-039482 on or about July 6, 2001;
- c. Possession of a narcotic drug (as a D felony) under Marion County (Indiana) cause number 49G14-0001-DF-010305 on or about November 12, 2000;

Conclusion and Request

Your Affiant submits that, based on the facts set forth in this Affidavit, probable cause exists that on May 04, 2020, in the Southern District of Indiana, Shaboo RODGERS, knowingly

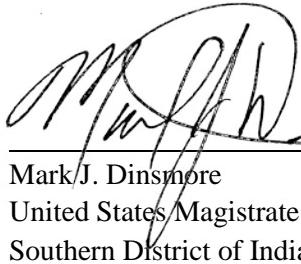
possessed a firearm in violation of Title 18, United States Code, Section 922(g)(1) Accordingly, your Affiant requests this Court issue a Criminal Complaint charging RODGERS with this crime, along with a warrant for his arrest.

/s/ Gregory A. Kessie

Gregory A. Kessie, Task Force
Officer
Bureau of Alcohol, Tobacco,
Firearms and Explosives (ATF)

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Dated: July 30, 2021


Mark J. Dinsmore
United States Magistrate Judge
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